

EXHIBIT 3B

**FRAUDULENT TRANSFER MINI TRIAL
DEFENDANTS' LIST OF FACT WITNESSES**

1. Richard DeRose (30(b)(6) witness for Houlihan Lokey) (by deposition designation)

Richard DeRose is a senior advisor at Houlihan Lokey. Mr. DeRose is expected to testify about Houlihan Lokey's solvency opinion practice generally, the solvency opinions Houlihan Lokey prepared to ensure Chemours would be solvent following the spinoff, and the process by which Houlihan Lokey reached its opinion.

2. Carmen Giannantonio (live)

Carmen Giannantonio was the Vice President of Corporate Mergers and Acquisitions at DuPont at the time of the Chemours spinoff. Mr. Giannantonio is expected to testify about his role in the Chemours spinoff, including the decision to separate the Performance Chemicals business from DuPont, the decision to pursue a spinoff as opposed to another transaction structure, and his interactions with third-party advisors and others related to the decision.

3. Donna Grier (by deposition designation)

Donna Grier was the Vice President and Treasurer of DuPont at the time of the Chemours spinoff. Ms. Grier is expected to testify about her role in the Chemours spinoff, including the reasons behind the spinoff, her work relating to establishing Chemours' anticipated capital structure and balance sheet, her interactions with third-party investment banks and other advisors helping with the spinoff, and the value and funding of the dividend Chemours paid to DuPont in exchange for the businesses Chemours received.

4. Ellen Kullman (live)

Ellen Kullman was the CEO of DuPont at the time of the Chemours spinoff. Ms. Kullman is expected to testify about DuPont's reasons for deciding to pursue a separation of the Performance Chemicals business, reasons for structuring the separation as a spinoff, process for ensuring that Chemours would be a solvent, viable entity at spinoff, and the discussions about Chemours's capital structure, liquidity, and solvency.

5. Julie Mazza (live)

Julie Mazza was Associate General Counsel of DuPont at the time of the Chemours spinoff. Ms. Mazza is expected to testify about the contingent litigation liabilities going to Chemours as part of the Chemours spinoff and Deloitte's valuation of the same.

6. Sheryl Telford (live)

Sheryl Telford was the Director of the Corporate Remediation Group at DuPont until the Chemours spinoff and then became the Director of EHS and Remediation at Chemours after the spinoff. Ms. Telford is expected to testify about the Corporate Remediation Group's processes for establishing remediation plans and estimating potential remediation costs and her involvement in valuing the contingent remediation liabilities going to Chemours as part of the spinoff for the solvency analysis.

7. Edward Trainor (30(b)(6) witness for Deloitte) (by deposition designation)

Edward Trainor is a Principal at Deloitte. Mr. Trainor is expected to testify about Deloitte's valuation of the contingent litigation liabilities going to Chemours as part of the Chemours spinoff.

8. Mark Vergnano (live)

Mark Vergnano was Executive Vice President at DuPont until the Chemours spinoff and then became President and CEO of Chemours after the spinoff. Mr. Vergnano is expected to testify about his involvement in the Chemours spinoff, including the Performance Chemicals business units' preparation of financial projections, his involvement in decisions relating to the spinoff, Chemours' business plans, and his understanding of Chemours' liquidity and solvency.

9. Linda West (live)

Linda West was Vice President of DuPont Corporate Planning and Analyses at the time of the Chemours spinoff. Ms. West is expected to testify about her work executing the Chemours spinoff, including the reasons behind the spinoff, the decision-making and communication processes used in preparation for the spinoff, the third party advisors involved in the process, and the work done to ensure Chemours' solvency at the time of the spinoff.

**PLAINTIFFS' OBJECTIONS TO
DEFENDANTS' LIST OF FACT WITNESSES**

1. Plaintiffs object to unqualified opinion testimony from non-expert witnesses regarding whether Chemours had sufficient assets to fund its debts at the time of or after the spinoff; whether Chemours was insolvent at the time of or after the spinoff; whether Chemours received reasonably equivalent value for transfers made to DuPont in connection with the spinoff; or whether Chemours was left with an unreasonably small amount of capital to continue its business at the time of or after the spinoff. *See* Fed. R. Evid. 701.